Exhibit 1



Firm Resume 2024

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Heather Collins is the owner and founder of HMC Civil Rights Law and has litigated and served as lead trial counsel in civil rights and employment cases in federal and state courts for over twenty years. Heather has a particular focus on trial practice but is a skilled negotiator as well.

Since starting her practice, Ms. Collins has regularly been selected Mid-South Super Lawyers® list and the Best Lawyers® list for Employment Law on behalf of Individuals.

Says Kevin Sharp, former District Judge for the Middle District of Tennessee, "Ms. Collins is a wellrespected and skilled professional, who is a member of the National Employment Lawyers Association (NELA) and the Tennessee Employment Lawyers Association (TENNELA) and has held leadership positions in each. I have personally observed Ms. Collins to be a wellinformed attorney who represents her clients diligently and keeps informed about developments in

Firm Resume

HMC Civil Rights is a Tennessee-based boutique litigation firm focusing on the vindication of violations of our clients' civil rights. Since 2009, HMC Civil Rights, and its predecessor firms, have filed over 270 cases on behalf of its clients. In the wake of the "Me Too" movement, HMC's practice shifted to a heavy emphasis on the representation of survivors of sexual assault in the workplace, educational setting, and directly against perpetrators. In the past three years alone, HMC Civil Rights has settled or obtained verdicts in excess of 15 million dollars.

HMC's team is led by Heather Moore Collins, an experienced civil rights and employment law attorney who has represented clients in a wide range of employment-related matters, including discrimination, harassment, and claims of retaliation. Ms. Collins has dedicated her career to protecting the rights of employees and persons whose civil and constitutional rights have been violated. She has filed 221 cases in the Middle District of Tennessee, 34 cases in the Eastern District of Tennessee and 14 cases in the Western District of Tennessee. Since founding HMC Civil Rights and its predecessor firms, Ms. Collins has served as lead trial counsel in front of 13 juries across each of the federal districts in Tennessee, the majority finding in favor and awarding verdicts for the Plaintiffs she represented.

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Representative Cases

HMC Civil Rights has represented clients in a wide range of legal matters, including workplace discrimination, harassment, and retaliation claims; sexual harassment and assault in the workplace, educational setting, and otherwise; and violations of prisoners' rights, in state and federal court, as well as before the Equal Employment Opportunity Commission and the National Labor Relations Board. The following cases illustrate the work of HMC Civil Rights and its predecessor firms since 2009.

Workplace Sexual Harassment and Assault

Smith v. Rock-Tenn Corp., 3:12-cv-0616 (M.D. Tenn.): Case representing a manufacturing employee for claims of workplace sexual harassment, discrimination, retaliation, and constructive discharge. Plaintiff was awarded a jury verdict of \$307,000.00 (reduced to the statutory cap of \$300,000.00), which was upheld by the Sixth Circuit Court of Appeals.

Doe v. New Aspen Management, LLC, 3:20-cv-00125 (M.D. Tenn): Case representing a leasing office employee for claims of sexual harassment and disability discrimination. After Plaintiff's claims survived summary judgment briefing, the parties reached a confidential settlement to resolve the claims.

Sexual Harassment and Assault in Education

C.K., a minor child, v. West Carroll Special School District Board of Education, et al., 1:23-cv-01133 (W.D. Tenn.): Case representing a high school student who was sexually assaulted and harassed by other students while on a football team trip. Plaintiff is suing for violations of Title IX, Equal Protection, negligence, and First Amendment retaliation. The case is currently pending before Hon. J. Daniel Breen.

Employment Discrimination



Since joining HMC Civil Rights in 2019, **Ashley Walter** has played a central role in the firm's multimillion-dollar track record. Ms. Walter has been recognized by her peers as a "Rising Star" by Super Lawyers and Best Lawyers "Ones to Watch."

Ms. Walter has led the litigation of close to 40 civil rights and employment cases in federal and state courts and has assisted in the litigation of countless others, including two jury trial assists.

Says fellow civil rights and employment litigator Brian Winfrey, "HMC Civil Rights are among the best advocates in this practice area . . . This firm will fight for its clients against large corporations with the skill and fearlessness needed to secure the best results."

Gunter v. Bemis Co., Inc., 4:16-cv-0037 (E.D. Tenn.): Case representing a 25-year employee for claims of disability discrimination and retaliation. The jury awarded Plaintiff over \$580,000 in damages.

Lowe v. Calsonic, 3:18-cv-0027 (M.D. Tenn.): Case representing a 27-year manufacturing employee regarding violations of the Americans with Disabilities Act and the Family Medical Leave Act. Plaintiff was awarded a verdict of compensatory damages, back pay, front pay, punitive damages, attorneys fees, and legal costs, over \$540,000 in total.

Beard v. Hickman County Government, 1:22-cv-00019 (M.D. Tenn.): Case representing a 10-year law enforcement employee for claims of disability discrimination and retaliation, violations of the FMLA, and age discrimination. The case is currently pending before Hon. William Campbell.